

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
vs.)
)
CARLOS RAINEY, et al)
)
Defendant.)
_____) Case No. 3:05-cr-108-02-JWS

DEFENDANT SHANNON RAINEY'S
PROPOSED JURY INSTRUCTIONS

Defendant Shannon Rainey, by and through her attorney D. Scott Dattan, submits herewith the following proposed jury instructions. All references to proposed jury instructions contained herein refer to those included in the Ninth Circuit Manual of Model Criminal Jury Instructions, 2003 edition.

Defendant respectfully requests the following specific jury instructions be given at the trial in this matter:

Instruction No. 4.1	Statements by the Defendant
Instruction No. 4.9	Testimony of Witness Involving Special Circumstances
Instruction No. 4.13	Government's Use of Undercover Agents And Informants
Instruction No. 4.17	Opinion Evidence, Expert Witness
Instruction No. 6.6	Duress, Coercion or Compulsion (Legal Excuse)
Instruction no. 8.16	Conspiracy – Elements

Instruction No. 8.120 Financial Transaction to Promote
Unlawful Activity

Instruction No. 8.121 Laundering Monetary Instruments

DATED this 24th day of May, 2006.

s/D. Scott Dattan
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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2006, a copy of foregoing was served electronically on: Stephan Collins, Mike Dieni, Allan Beiswenger, William Carey, John C. Pharr, Scott Sterling, Lance Wells, T. Burke Wonnell, Mark Rosenbaum, Raul Martinez, and Hugh Fleischer.

s/D.Scott Dattan